

Exhibit D



RMS TITANIC, INC.

(RMST)

**AFFILIATE OF EXPERIENTIAL MEDIA GROUP, LLC
(EMGroup)**

And

**SUBSIDIARY OF PREMIER ACQUISITION
HOLDINGS, LLC (PAHL)**

COLLECTIONS MANAGEMENT POLICY

Mission:

The primary mission of RMS Titanic, Inc. Collections Department is the preservation and use of the *Titanic* Artifact Collection to educate future generations about the tragic story. By extension, stewardship includes the development and safeguarding of documentation related to expeditions, scientific analysis, artifact research, and all internally developed intellectual property that contributes to a more complete understanding of all aspects of RMS *Titanic*.

Goal:

RMS Titanic Inc. has sought and will continue to seek to preserve and promote the memory of the *Titanic* with dignity and respect, and with due regard to *Titanic*'s historical and maritime significance.

Introduction

This document establishes general guidelines for the care, maintenance and exhibition of the recovered collections of RMS *Titanic* and articulates the responsibilities of RMST officials regarding objects that are acquired by and placed in the care of RMST.

I. Scope of Collections

- A. RMST's *Titanic* Artifact Collection consists of all artifacts salvaged by RMST from the debris field during the 1987, 1993, 1994, 1996, 1998, 2000 and 2004 expeditions to the wreck site of the ship, RMS *Titanic*.
- B. RMST houses a media library consisting of dive footage in numerous formats, slides, color photographs, and digital stills from expeditions in 1987, 1993, 1994, 1996, 1998, 2000, 2004, and 2010. The media library also houses imagery of the recovered artifacts over time from the date of recovery.
- C. Educational and study materials and ephemera associated with *Titanic* but not recovered from the wreck site.

II. Acquisitions

- A. The *Titanic* Artifact Collection includes only artifacts that have been recovered from the wreck site during planned expeditions. Additional acquisitions will be made only from future recovery expeditions.
 - 1. Accession numbers are assigned during an expedition by Collections staff. These are identifying numbers that will be entered in the master database of the *Titanic* Artifact Collection with all associated data.
 - 2. Certificates of Origin for each recovered artifact will be drafted and signed by the expedition leader and the ship's captain verifying that the artifact was recovered from the wreck site of RMS *Titanic*.
- B. The Media Library will be expanded as opportunities with partners in expeditions, film, documentation, or other media present themselves. The Media Library expansion is ongoing and under the guidance of the Collections Department and EMGroup.
- C. The Education and Study Collection may be expanded at the discretion of the Collections Department and EMGroup supported by funding from the parent company.

III. Exhibitions

One of the primary responsibilities of EMGroup¹ pertaining to the *Titanic* Artifact Collection is the use of educational exhibitions to share the Collection and the legacy of RMS *Titanic* with the global public. To that end, EMGroup plans, designs, installs and monitors exhibitions of the *Titanic* Artifact Collection under the brand *Titanic: The Artifact Collection*.

¹ Both EMGroup and RMST are wholly-owned subsidiaries of PAHL.
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In these exhibitions, EMGroup exhibits artifacts at qualified institutions for a specific length of time and under approved environmental conditions. The exhibition agreements contain a listing of the artifacts to be exhibited.

A. Guidelines Governing Exhibitions and Temporary Loans of Artifacts

1. Exhibitions and temporary loans of artifacts may be made to the following entities:
 - a. Museums.
 - b. Facilities with appropriate environmental controls and a solid security system, in which artifacts will be well cared for and monitored.
 - c. Other exhibit organizers acting under contractual agreement with EMGroup.
 - d. Recognized conservation professionals for treatment.
2. EMGroup will only consider exhibiting artifacts that are in suitable condition to endure the term of the exhibition and at the discretion of the Collections Department.
3. Any entity exhibiting or borrowing artifacts will be required to submit a Standard Facilities Report or similar document to ensure that artifacts will be exhibited in appropriate conditions. The required conditions are specified in the signed contract and associated production rider.
4. EMGroup will consider the risk of any potential damage that could result from travel, display or handling of the object(s) while on loan or display, as well as any risk of seizure, levies or similar actions.
 - a. The VP of Collections and the Collection Manager will be responsible for administering and processing the exhibition materials and relevant documentation related to the artifacts.
 - b. EMGroup follows the American Alliance of Museums' Best Practices for exhibitions.

B. Protocols for Artifact Exhibitions

1. Exhibited artifacts are subject to a condition report to assess condition both before and after an exhibition. The condition notes are added to the *Titanic* Artifact Collections database with photographic documentation as necessary.
2. Exhibited artifacts are packed and unpacked by RMST Collections staff and/or professional art handlers or registrars who have been trained by RMST. Artifacts are cavity packed with archival materials in coroplast or archival boxes within wood crates or road cases.
3. Artifacts are exhibited in closed cases provided by EMGroup, manufactured to conservation standards. Cases can support microclimates for exhibited materials as needed.
4. In collaboration with RMST's fine arts insurer, Collections staff follow a written Standard Operating Procedures document (Appendix A).
5. After installation, venue staff are trained in the maintenance and monitoring of the exhibition.

- a. Venue staff record the temperature and relative humidity inside each case using a digital monitor on a daily basis.
 - b. Venue staff record visible light once a week; a light meter is provided by RMST.
 - c. Venue staff send weekly environmental charts to the Collections Department for review.
6. Venues are provided with Condition Notebooks and a Security Notebook. The former contains condition notes on each artifact in the exhibition with associated photographs. The latter includes contact information, artifact exhibition details, exhibition layout, incident report form, and equipment information.

IV. Guidelines governing the documentation, care, and access to the collection

A. Documentation

1. All objects acquired for the collection shall be promptly recorded and documented in both electronic and paper records in an orderly and retrievable fashion, in conformity with professional Museum standards and accepted practices.
2. Recovered artifacts in the *Titanic* Artifact Collection shall be assigned an accession number when processed on the recovery vessel. This number represents the recovery year, artifact number, and associated elements. For example, the number 87/0102.1, 2 would represent recovery of item 0102 in two parts during the 1987 expedition. During treatment or research, numbers might be adjusted to reflect additional elements so that each artifact or fragment has a unique number that is trackable.
3. The Collections Manager shall be responsible for compiling and maintaining certificates of origin records, which document the salvage history of all artifacts. The Collections Manager shall be responsible for compiling and maintaining records, which record up-to-date object information including description, exhibition, research, location, physical condition and photographic documentation. In addition, the Collections Manager shall periodically conduct an inventory of objects in collection storage and on exhibit.
4. On the basis of current scholarship and to the best of their ability, the Collections staff shall be responsible for establishing and updating collections records with comprehensive catalog information, which establishes the cultural context, provenance, date, and any other pertinent information, which adds to the educational and scholarly value of the object.
5. The Collections Database is the main repository for physical and curatorial information on each recovered artifact. The Collections Database is continually updated with all artifact activity: description, inscriptions, exhibit history, movement history, exhibition location, condition information, conservation treatments and dive and research notes. The Collections Department also maintains hard files for each artifact. In

addition, the Collections Database holds an archival collection of study and historical society materials.

6. Copies of the Collections Database, intellectual property related to the *Titanic* Artifact Collection, and primary, original documents are stored off site at data storage centers and cold storage facilities.

B. Care and Handling

1. All objects shall be handled according to Museum Standards for Handling Guidelines (Appendix B).
2. All objects in the *Titanic* Artifact Collection shall be stored, displayed and maintained in conditions and in an environment conforming to professional Museum standards and best practices to ensure their security and long-term preservation.
3. The *Titanic* Artifact Collection shall only be handled by professional members of the Collections Department (conservator, collections manager, registrar), trained artifact handlers, and conservators.
4. The physical condition of the artifacts will be reviewed and documented continually by Collections staff. Regular inventories are conducted with data entered into the database.

C. Storage

1. All objects shall be stored according to Museum Standards and best practices.
2. The *Titanic* Artifact Collection is stored in 4 environmental zones within the Collections Facility: one zone each for organic and inorganic materials, one zone for larger artifacts, and one zone for crate storage and unpacking.
3. All housing materials are archival and consistent with best practices.
4. As needed, housing materials and furniture are upgraded.
5. The environments of each zone are monitored on a daily basis.

D. Pest Management

EMGroup contracts a professional pest management company to make monthly external and internal inspections of the Collections Facility and storage areas.

E. Insurance, Security and Safety

1. The *Titanic* Artifact Collection is covered by a fine arts insurance by an internationally recognized insurer.
2. Insurance coverage is effective 24/7, door-to-door, and in all locations.
3. Security systems are provided by a nationally recognized firm. The installed system is designed to detect any form of intrusion. Only staff who actually work in the Collections Facility are assigned keys and codes.
4. Collections staff are the only personnel with access to the collection storage areas.
5. If other personnel need access to the collection zones, they are accompanied by a Collections staff person at all times.

6. Fire suppression and security systems are inspected annually.
7. The Collections Facility maintains a building operational document and maintains a maintenance service record.
8. The collection is accessible, consistent with the safety and security of the individual objects. Access to the collection may be granted by the CEO of EMGroup and the Collections Department Head to other company staff, researchers, consultants, media companies, etc. with advance written permission of a project approval or contract.

V. Conservation Care and Maintenance

- A.** The Physical condition of objects in the collection will be reviewed by the Collections staff on a regular basis. Conservation treatment should be carried out only as necessary and with the consultation and approval of the CEO of EMGroup. Treatment should be performed by a professional conservator and undertaken according to the standards of practice and ethical codes established by the American Institute for the Conservation of Historical and Artistic Works. All conservation treatment should be fully documented and respect the historic integrity of the object.
- B.** After salvage, and prior to any form of exhibition, full conservation must be addressed for each object. Given the extensive nature and costs of marine artifact conservation, and the fact that every single recovered object is in need of conservation, unlike most collections, it is understood that these procedures are on-going. Through a mixture of preventative conservation and treatment, all objects will either be conserved and kept in a stable storage environment when not on display, or they will be kept in an appropriate storage environment until such time as full conservation needs can be met.
- C.** Storage environments for objects in need of treatment, or not fully conserved will be:
 1. Freeze dried (paper and some organic objects) until such time as they can be fully cleaned and encapsulated
 2. Frozen (textiles, organics) to delay deterioration
 3. Kept in water (metal and some organics), and when possible, kept in desalination solution, to reduce/delay corrosion, and slowly begin the desalination process.
 4. Kept in refrigerator (liquids and some organics) to prevent mold growth and delay deterioration.
- D.** The storage and care of conserved objects will meet the following conditions:
 1. Papers will be kept in archival boxes, folders, and/or mylar sheets in low light levels at a temperature of approximately 68° and 50% relative humidity.

2. Organics and textiles will be stored in archival boxes or trays with archival tissue, or ethafoam-lined shelving at a temperature of approximately 68° and 45% relative humidity.
3. Metals (dry) will be stored using archival materials and ethafoam-lined shelving at a temperature of approximately 70° and a relative humidity between 30% and 40%.
4. Glass and ceramics will be stored using archival materials and a temperature of approximately 70° and a relative humidity with little fluctuation.
5. All materials and equipment used in packing, storage and movement will be archival.

E. The selection process for artifacts to be conserved is as follows:

1. RMST and EMGroup recognize and are committed to the conservation of all artifacts in the *Titanic* Artifact Collection.
2. RMST and EMGroup will establish a list of artifacts that would be considered for conservation during the year.
3. The criteria for selection will be based upon artifact condition, curatorial importance, scientific importance, and cultural contribution to *Titanic's* body of knowledge.
4. EMGroup will establish a contract for conservation with a third-party professional conservation studio for treatment of selected groups of artifacts. The actual artifacts to be submitted for treatment will be determined in consultation with the Collections Department, EMGroup and the selected conservators.
5. The Collections Department will monitor the conservation progress annually, recognizing that successful treatment cannot always be precisely timed.
6. Conservation treatments will be accompanied by full treatment reports and photographic documentation which will be entered in the database.

VI. Deaccession Policy

Over time, artifacts, though treated, may reach a status of limited use. In that instance, RMST and EMGroup will determine the future use of the artifact. Currently RMST and EMGroup do not support deaccessioning artifacts from the *Titanic* Artifact Collection, and there is no approved Deaccession Policy for The *Titanic* Artifact Collection in place. In the event that the company considers any deaccessioning in the future, the following considerations – consistent with the 2010 Revised Covenants and Conditions – will be taken into account in developing a deaccession policy:

A. Considerations for future use of artifacts that have reached limited use status:

1. Retired from exhibition, but available for research.

2. Long-term storage in a stable environment, generally without research availability.
3. Untreated fragmented materials may be available for scientific research upon presentation of a coherent proposal with projected results. To the extent required by the Covenants and Conditions, approval for such proposal will be sought from the United States District Court for the Eastern District of Virginia (the “Admiralty Court”).

B. Criteria for Deaccessioning

1. No remaining scientific, educational or exhibition value.
2. Inherent hazardous condition.
3. Disintegration where conservation treatment will not prevent complete and inevitable deterioration.

C. Methodology

1. If the above criteria for deaccessioning have been met, RMST and EMGroup will follow several steps to document the reason for deaccessioning (Appendix C).
2. A qualified professional conservator must examine the artifact, determine that no treatment will preserve the artifact, and complete a Deaccession Recommendation Form
3. A qualified *Titanic* scientist must examine the artifact, determine that there is no useful research that can be obtained from the artifact and complete a Deaccession Recommendation Form
4. A qualified *Titanic* historian must examine the artifact, determine that there is no useful historical information that can be obtained from the artifact and complete a Deaccession Recommendation Form
5. The Deaccession Recommendation Forms will be submitted to EMGroup for assessment.
6. If EMGroup agrees with the above listed experts and desires to deaccession the artifact, a proposal, along with the forms, will be submitted to the Admiralty Court to the extent required by the Covenants and Conditions.
7. If the deaccession is approved, then EMGroup will determine method of disposal as listed below.
8. If the deaccession is not approved, then EMGroup will continue to provide appropriate storage for the artifact.

D. Disposal

Objects deaccessioned from the RMS *Titanic* Collection will be disposed of in one of the following manners:

1. Objects may be relinquished directly to the Admiralty Court for disposal.

2. Objects will be physically destroyed depending upon the type of material. All records relating to the method of destruction will be retained within the collections management system.
3. Donation to conservation or research institution, or a museum for research, scientific or educational purposes.
4. Donation to consulting conservators for testing purposes. The object may be donated to conservators acting as consultants to the *Titanic* collection solely for the purpose of research and testing. The object may only be donated with the understanding that it cannot be publicly exhibited or sold to any other institution or individual.
5. Sale to conservation, research institution, or another museum for educational and exhibition purposes, the proceeds of will be used for the future conservation and care of artifacts still in the collections of RMS Titanic, Inc.

Adopted on May 23, 2019
RMST/EMGroup/PAHL

APPENDIX A



STANDARD OPERATING PROCEDURES FOR RMST AND EMGroup *TITANIC EXHIBITION ARTIFACTS*

HANDLING

- Only EMG Collections staff will install, deinstall, and handle all artifacts, or instruct such handling with direct supervision to approved individuals.
- No artifact may be deinstalled, altered, cleaned, conserved, repaired, or transported without the written permission of EMG'S Collections Department, except in an emergency. In the event of an emergency, EMG'S Collection Department must be notified as soon as possible.
- Collections staff may authorize the removal of any artifact if warranted by its condition before or during exhibition.

CARE and ENVIRONMENT

- The artifacts should be maintained in the condition in which they were received. The exhibition venue is responsible for care of the objects according to AAM Best Practices.
- The EMG'S Collections Department maintains a database of artifact condition reports with written and photographic documentation. The current designated artifact condition reports for each venue will remain on site for reference as needed.
- Artifact care is based upon the standards and best practices established by the American Alliance of Museums and the American Institute for Conservation.
- *Titanic* venues will maintain 70° F and 50% RH with minimal daily fluctuation (\pm 2°F and \pm 5% RH). Venues without RH control systems may be approved on an individual basis through the venue review process.
- Collections staff may create microclimates for individual artifact cases based upon materials displayed. These microclimates are in addition to the maintenance of museum standard ambient temperature and relative humidity as noted above.
- Natural light is not acceptable in the exhibition area.
- Light type and level will be approved and set by the Collections Department for each artifact case based upon conservation lighting standards.
- Smoking, eating and drinking are not permitted in the exhibition area at any time.
- Venues will be clean and free of any leaks, infestations, or other adverse environmental conditions.

PACKING AND TRANSPORTATION OF ARTIFACTS

- Packing of artifacts is completed solely by EMG'S Collections staff with the assistance of trained and approved object handlers (registrars, curators, conservators, technicians, etc.) using standard museum archival materials and methods.
- During packing, unpacking, installation, and deinstallation of *Titanic* exhibition artifacts, two dedicated security guards must be present at all times.
- All shipping arrangements will be made by Collections staff, who will also oversee the loading/unloading of shipped artifact crates in cooperation with EMG'S Production staff.
- Artifacts are shipped by established fine arts shipping firms using dual driver, climate-controlled trucks shipping door-to-door or by fine arts shuttle. Occasional exceptions are made for extremely large artifacts or intercontinental transport. Any exceptions must be determined prior to inclusion in the artifact exhibition list.

SECURITY

- The venue agrees to safeguard the artifacts under generally accepted museum conditions of control and security during the entire time the artifacts are on premises.
- The exhibition shall be monitored by EMG using an automated camera surveillance system 24/7, connected to the company internet server system, unless the in-house venue system meets EMG'S required and established standards of surveillance.
- All doors and access points to the venue shall be secured, alarmed, and equipped with motion detectors. In situations where the venue is a Museum or Science Center, the exhibition space must have its own functioning alarm system with motion detection at entry and exit points. As necessary, EMG will install perimeter security for the exhibition space when not provided by the venue. In the event of a public venue that is too large for the existing perimeter security to reasonably monitor, EMG will install an additional monitored perimeter security system for the exhibition space.
- Audible alarms will be attached to exhibit cases as needed.
- For the duration of the exhibition, there will be either human presence assigned to monitor the security alarms, serving as a central station, or a formal central station monitoring service off-site.
- Security must be available to Collections staff during the installation and deinstallation of artifacts.
- Security personnel will circulate through galleries for the term of the exhibition during open hours.

FIRE DETECTION/SUPPRESSION

- All locations will have functioning fire suppression systems and/or fire alarms that are central station-monitored.
- All locations shall have an appropriate number of fire extinguishers for the square footage of the exhibition space.

- In some instances, 24/7 human presence with central office contact, appropriate to the size and configuration of the venue, may be permitted in lieu of a central station operating system.

STORAGE

- *Titanic* artifacts shall only be stored in climate-controlled warehouses with central fire and security when storage is needed before, during or after exhibition at the venue.
- Empty artifact crates shall be stored in a secure climate and temperature controlled indoor storage area, protected from moisture, pollution, fungus and vermin.

APPENDIX B



RMS TITANIC, INC. Deaccession and Disposal Record

1. Description of Object
Acc. No:
Title:
Medium:
Dive Number:
2. The Company must have legal right to dispose of the object. How has this been determined?
3. What was the means of acquisition of the object?
4. If the object was a gift, answer the following:
 - Is the donor still alive?
 - Has the donor (or heirs of the donor) been informed of the institution's intentions?
 - Is the donor likely to make a further gift or bequest to the institution?
 - Has the donor (or heirs) objected to the deaccession or disposal?
5. Describe the overall condition of the object:
6. Current market value?
How determined:
7. When was the object last exhibited?
8. Does the object have future value?
 - For exhibition?
 - As part of a research or teaching collection?

9. Specific reason for deaccessioning object:

10. Opinions to substantiate deaccessioning recommendations:

Contrary Opinions:

11. Is there another institution or individual, which might consider the object for exchange purchase or gift?

12. Who recommended the object be deaccessioned:

13. What means of disposal is recommended:

14. Who recommended the object be disposed of in above manner:

15. Signatures:

_____	_____
Collections Manager	Date

_____	_____
Conservator	Date

_____	_____
President, RMS Titanic, Inc.	Date

_____	_____
Chair, Governing Board	Date

16. Board actions taken Date:

17. Comments or restrictions on disposition made by the board:

18. Disposition of objects:

Value received: Date:

APPENDIX C

Object Handling Guidelines

General Rules

- Wear clean, comfortable clothing with no protruding jewelry, watches, or buckles. Do not wear your ID badge or chain around your neck unless you can safely put it behind you, so it does not fall on an object. Wear clean cotton or thin nitrile gloves. Change gloves frequently.
- Know exactly where you are moving an object and have location ready to receive object before you move it. Anticipate problems and check to make sure path is not blocked, and doors are open.
- Carry only one object at a time with both hands. Whenever possible, use object carts to transport objects.
- If damage occurs in moving, create an incident report ASAP, and update the condition report. Notify conservator, but do not try to repair object.
- Do not hand an object from one person to another. Set object down for the other person to pick up.
- Use archival tissue or foam to place object in stable position on object movement cart. Object should not roll or be able to shift while being transported.
- Handle object as little as possible.
- Keep carts clean, and free of tools and equipment.
- Do not eat, drink, or smoke in vicinity of objects.

Paper Artifacts

- Handle mounted works only by the mounts.
- Lay paper objects on acid free board, or in archival box so it can be moved kept flat.
- Do not stack object on top of smaller objects, causing top objects to bend.
- Be aware that objects in Mylar seem more stable than they might actually be. Mylar might present a false sense of security. Handle these objects as if they were not encapsulated.
- Do not open books or bound artifacts unless careful examination reveals that binding will not be damaged in opening.

Three-dimensional artifacts

- Objects with protruding parts such as handles on dishware and kitchen implements should not be picked up with handles. Objects should be picked up with two hands with support under the most stable part of the object (usually the base).
- Objects made of multiple materials should be lifted to support areas where materials are joined, as these are often the most fragile part of the objects.
- Large or heavy objects should always be lifted by more than one person. Just because one person can move a heavy object, does not mean it is safe to do so. Use good judgment.
- Small objects such as jewelry and coins should always be carried in a tray or box.